Illinois Tool Works Inc. Corporate Headquarters 3600 West Lake Avenue Glenview, I_ 60026-1215 Telephone 847.724.7500





August 17, 2006

Ms. Karen Cibulskis Remedial Project Manager U.S. EPA Region 5 - Superfund Division Mail Code SR-6J 77 West Jackson Boulevard Chicago, IL 60604

Re: ASAOC for RI/FS - Designation of Project Coordinator

South Dayton Dump and Landfill Superfund Site - Moraine, Ohio

Dear Karen:

Pursuant to the Administrative Settlement Agreement and Order on Consent (ASAOC) for Remedial Investigation/Feasibility Study (RI/FS) for the South Dayton Dump and Landfill Superfund Site (Site), this letter designates Mr. Stephen M. Quigley of Conestoga-Rovers and Associates (CRA) as the Project Coordinator responsible for administration of all actions by the Respondents required by the ASAOC. Mr. Quigley's contact information is as follows:

Stephen M. Quigley

CRA 651 Colby Drive

Waterloo, Ontario N2V 1C2

Office Phone: 519-884-0510

Mobile Phone: 519-498-7997 519-884-0525

Facsimile:

E-mail:

squigley@craworld.com

A description of Mr. Quigley's qualifications is enclosed. Per our previous discussion, I will continue to be the point of contact for the Respondents for technical matters. Robin Lunn of Mayer Brown Rowe & Maw in Chicago will continue to be the point of contact for the Respondents for legal matters. Robin's office phone number is 312-701-7274, facsimile number is 312-706-8364, and his e-mail address is rlunn@mayerbrownrowe.com. Please contact me at 847-657-4843 or kbrown@itw.com for questions or discussion.

Sincerely.

Ken Brown, CHMM

Environmental Engineer

Enclosure

cc: Representatives for Respondents

EDUCATION

B.Tech. (Chemical Engineering), Ryerson Polytechnical Institute, 1979 - 1984

EMPLOYMENT

2000 -	•	Project Manager/ Vice President/Executive Committee Member/Principal,
Prese	nt	Conestoga-Rovers & Associates
1995-	- 2000	Project Manager/Principal, Conestoga-Rovers & Associates
1994-	95	Associate / Project Manager, Conestoga-Rovers & Associates
1991-	94	Project Manager, Conestoga-Rovers & Associates
1989-	90	Project Engineer, Conestoga-Rovers & Associates
1988-	8 9	Project Engineer, Canada Packers Specialty Chemical Group
1987-	88	Production Foreman, Canada Packers Specialty Chemicals Group
1984-	8 7	Health, Safety and Environmental Supervisor, Canada Packers Chemicals Division
1984		Quality Control Technician, Canada Packers Chemicals Division

AFFILIATIONS

Registered Professional Engineer (Environmental) - Arizona (#31740), Delaware (#13494), and New Hampshire (#11312)

Member - Association of Professional Engineers of Ontario

Member - American Society of Civil Engineers

PROFILE OF PROFESSIONAL ACTIVITIES

- Environmental Engineer responsible for one or more of the following: site investigation, site characterization, feasibility studies, litigation/hearings support, remedial design; contract document and specification preparation, and construction supervision for the following projects/clients:
 - Project Director for fleetwide radionuclide hydrogeologic investigation at 11 nuclear generating stations in Illinois, Pennsylvania, and New Jersey, including the development of risk of release analyses, work plans, management of the field work, and preparation of hydrogeologic investigation reports - ongoing
 - Project Manager and auditor for Environmental Site Assessments and Baseline Environmental Assessments at facilities in the United States and Canada, including vacant properties, out-of-service facilities, and active industrial operations ongoing
 - Litigation Consultant for Superfund Site in Ohio, 1998 ongoing
 - Project Manager for Remedial Investigation and Feasibility Study South Dayton Dump Site ongoing

- Project Director for the investigation and remediation of the Boeing property at Pearson International Airport, Toronto, Ontario, 1996 ongoing
- Expert Witness, citizens' suit, Downers Grove, Illinois, 2006
- Principal-in-charge for Site decommissioning and demolition project, City of Industry, California, 2005 – 2006
- Principal-in-charge for liability buy-out project, Davis Tannery, Kingston, Ontario, Ontario,
 Canada, 2004 ongoing
- Principal-in-charge for wastewater treatment system design and construction, Elmira, Ontario
 2004 ongoing
- Principal-in-charge for solid waste transfer station approval and permitting, Vaughan, Ontario,
 2004 ongoing
- Principal-in-charge of operation and maintenance of a chemical plant's treatment system,
 Hightstown, New Jersey, 2004 2006
- Litigation consultant for air emissions and dispersion project, confidential, Pennsylvania, 2004 ongoing
- Principal-in-charge for two brownfield sites' redevelopment into condominiums, Confidential,
 Toronto, Ontario, 2004 ongoing
- Principal-in-charge RD/RA for Tucson International Airport Superfund Site, Tucson, Arizona, 2002 ongoing
- Principal-in-charge of ongoing ambient air emissions control and monitoring project in Elmira, Ontario, 1999 ongoing
- Cost allocation and cost recovery expert witness, Vertac Superfund Site (on-site incineration, off-site incineration, groundwater recovery and treatment, and capping of a dioxin-contaminated site), Jacksonville Arkansas, 1998 – 2006
- Project Manager and Principal-in-charge for design of groundwater containment system for second operable unit, including RD Work Plans, design submittals and agency/community relations, 52nd Street Superfund Site, Phoenix, Arizona, 1996 – ongoing
- Project Manager and Principal-in-charge for Remedial Investigation (RI), Feasibility Study (FS),
 Remedial Design (RD) and Remedial Action (RA) including coordination of field work, database
 management, laboratory service coordination, preparation of Treatability Study Work Plans,
 completion of RI and FS reports, supervision of PCB-contaminated soil excavation and off-site
 disposal, preparation of RD and Work Plans and development of RD and implementation of RA,
 for a former solvent recycling/disposal facility, Jadco-Hughes NPL Site, Belmont, North Carolina
 (Generator Group), 1989 ongoing
- Remediation Engineering Project Manager for on-site and off-site groundwater, buried waste (including drummed waste, construction of containment facility for 30,000 cubic yards contaminated soil), air emissions permitting, environmental audit and Environmental Appeal Board hearings Uniroyal Chemical Ltd., Elmira, Ontario, 1989 ongoing
- Litigation consultant for Natural Resource Damage Suit, confidential, 2004 2006
- Expert Witness, Freshwater Pond Liner Suit, Phoenix, Arizona, 2004 2006
- Expert Witness, Insurance Recovery Suit, Confidential, Phoenix, Arizona, 2004 ongoing
- Expert witness and project manager in contamination assessment, confidential client, Toronto Ontario, 2003
- Principal-in-charge of RI/FS at the Scovill Industrial Landfill, Waterbury Connecticut, 2003 2004

- Expert Witness for cost recovery action, WM Landfill Site, Thomson, Georgia 2003 ongoing
- Technical Expert, forensic analysis of petroleum release data, manufactured gas plant site,
 Bridgeport, Connecticut, 2003 ongoing
- Principal-in-charge of the operation and enhancement of an air sparge system at an ISRA site,
 Paterson New Jersey, 2002 2003
- Litigation Consultant for land disposal sites in Pennsylvania, 2002
- In-house acting Remediation Manager for specialty chemical manufacturer, 2002
- Expert Witness for liability and cost recovery action, Michigan, 2001 2004
- Expert Witness in defense of citizens' suit against a railway tie treating company, North Little Rock, Arkansas, 2001, 2002, and 2004
- Principal-in-charge of a RCRA voluntary corrective action, Crompton Manufacturing Corporation, Connecticut, 1999 - 2004
- Principal-in-charge of a RCRA Voluntary Corrective Action and Transfer Act Site Assessment, confidential location, Connecticut, 1999 - 2003
- Principal-in-charge of Environmental Compliance Audit at 84-acre specialty chemical manufacturer, 1998 2002
- Project Manager for due diligence investigations for new production plant construction on a 500 acre parcel of land, various locations, 1997 – 2000
- Project Manager for evaluation and design of reservoir lining system and litigation support,
 Sedona, Arizona, 1996 2000
- Principal-in-charge of ongoing groundwater remediation project in Elmira, Ontario, including completion of Optimization Study, 1996 – ongoing
- Project Manager for site assessment and remediation of pesticide contamination, AirPro Property, including groundwater investigation, soil removal and construction of a geomembrane cap, Montgomery, Alabama, 1995 2004
- Project Manager for wastewater pretreatment system improvements, including a waste audit,
 evaluation of existing pretreatment system and design of process modifications, Meat Processor,
 Georgia, 1995 1996
- Principal-in-charge and Project Engineer/Expert Witness for allocation suit and administrative hearing for groundwater contamination, Elmira, Ontario, 1994 2004
- Project Manager FS, vadose zone treatability study, preparation of technical impracticability waiver application, and RD/RA for Tucson International Airport RI/FS (Superfund) Site, Tucson, Arizona, 1994 – 2002
- Project Manager for cleanup and demolition of a 2.3 million square foot former automotive manufacturing facility, Old Mack Site, Detroit, Michigan, 1994 – 1997
- Project Manager for surface and subsurface removal actions (approximately 9,000 containers and soil disposal) including development of Work Plan, Contract Documents and Specifications and provision of construction supervision, Jackson Drop Forge Site, Jackson, Michigan, 1994 - 1997
- Project Manager for construction oversight of non-hazardous liquid waste processing facility,
 Phoenix, Arizona, 1994 1996
- Project Manager for Environmental Site Assessment for 200-acre industrial park, Pontiac,
 Michigan, 1993 2000

- Project Manager for drum removal action (approximately 4,000 drums, soil disposal and groundwater collection/treatment/disposal), including development of Work Plan, Contract Documents and Specifications and provision of construction supervision, Northline Drums Site, Wayne County, Michigan, 1993 - 1994
- Project Manager and Auditor, site assessments for four automotive plastic injection molding plants, Ontario, Canada and Michigan, 1992
- Auditor, site assessments for soft drink bottling plants, North Carolina, 1992
- Technical manager, provision of technical advice and expert witness testimony, West Central Phoenix/West Osborn Complex, Maricopa County, Arizona, 1991 - 2002
- Technical manager, completion of site investigation, provision of technical advice in negotiations with state agency and USEPA regarding issuance of a RCRA HSWA permit, Florida, 1991 2002
- Remedial Investigation, including development of Work Plans, Contract Documents and Specifications, waste excavation including buried drums and contaminated soil, Cherokee County, South Carolina, 1991 – 1997
- Assessment of wastewater management and operation of a conventional spray irrigation effluent treatment system for a dairy plant, waste audit, and conceptual design of wastewater treatment facilities, Ontario, 1991 1996
- Technical coordination of intervenor group cogeneration and hydrogen production, environmental assessment hearings related to 25-year Demand/Supply Plan, Ontario Hydro, 1991 - 1993
- Technical assistance for suit related to the potential contamination of a food product including plant assessment, collection of environmental samples and data assessment (location confidential), 1990 – 1997
- Technical assistance on preparation of a critique of a contractor's RI/FS, a conceptual closure design and reports on state-of-the-art of landfill practice, 19th Avenue Landfill NPL Site, Maricopa County, Arizona, 1990 - 1993
- Plant Assessment for discharges to municipal treatment plant including a critique of municipal consultants sewage treatment plant design, data assessment, plant operations assessment, design and construction of pretreatment facilities, dairy plant, Ontario, 1990 1992
- Remedial Action oil recovery system, including work plan development, permitting, negotiation
 of Contract Documents and Specifications, Rock Island, Illinois, 1990 1991
- Project Manager and Principal-in charge for Feasibility Study, RD evaluation of remedial alternatives and remedy construction for a former hazardous waste landfill including the preparation and oversight of an ambient air monitoring program, critique of the EPA Risk Assessment, preparation and implementation of RD/RA Work Plans, Consent Decree negotiations, design and implementation of remedy, (cap, groundwater extraction/treatment, reinjection system, soil vapor extraction system), Hassayampa Landfill NPL Site, Maricopa County, Arizona, (PRP Group), 1989 2004
- Site assessment and evaluation of remedial alternatives, RCRA Closure, former solvent bulking and storage facility, Hartford, Connecticut, 1989 2001
- Remedial Action, design of remedial measures for a drummed inventory of wood treating solution recovered from underground storage tanks, including the development of work plans and contract documents and construction supervision, and implementation and completion of a Contamination Assessment Report resulting in a "No Further Action" decision from the State, Ft. Lauderdale, Florida, 1989 1994

- Technical overview of groundwater remedial action plan and technical review of 30% Remedial Design for a VOC contaminated aquifer, Indian Bend Wash NPL Site Operable Unit Feasibility Study and Record of Decision, Scottsdale, Arizona NPL Site (PRP Group), 1989 - 1991
- Critique of plaintiff's release estimates, air dispersion modeling and litigation support related to U.S. Department of Energy Facility (PRP), 1989 1991
- Technical Specialist/Project Engineer for the following project areas:
 - development and implementation of environmental waste treatment and general engineering projects
 - supervision and operation of a specialty chemical plant
 - development and implementation of an Environmental Protection Plan and spill response plan for chemical manufacturer
 - preparation of hazardous waste certifications and discharge permits
 - project management for SO₂ source monitoring program
 - development and implementation of national training program for dangerous goods transportation and health, safety and environmental protection
 - participation in environmental risk assessments
 - co-development of corporate health and safety rating system for a food company
 - development and implementation of industrial hygiene surveys and analyses
 - supervision of the development of an asbestos removal training program
 - RCRA compliance

Publications and Seminars

- Integration of Environmental Management and Occupational Health and Safety, Occupational Safety and Health '91 Conference
- Evolution of Environmental Regulations in Ontario, Canadian Society of Safety Engineers Meeting, February 1991
- Laboratory Decommissioning, OH&S Canada, November/December 1992
- Hicks, P., McBean, E., Polan, B., and Quigley, S., "Issues Regarding the Application of a Mass-Balance Equation to an Urban Creek", <u>Further Advances in Modeling the Management of Stormwater</u> <u>Impacts</u>, February 1996
- Hicks, P., McBean, E., Polan, B., and Quigley, S. "Issues Regarding the Application of a Mass-Balance Equation to an Urban Creek", <u>Advances in Modeling the Management of Stormwater Impacts</u>, <u>Volume 5</u>. Proceedings of the Stormwater and Water Quality Management Modelling Conference, Toronto, Ontario, February 22-23, 1996
- Hicks, P., McBean, E., Polan, B., and Quigley, S., "Issues Regarding the Application of a Mass-Balance Equation to an Urban Creek", Advances in Modeling the Management of Stormwater Impacts, Volume 5, Computational Hydraulics International, 1997
- Quigley, S. and Polan, B. "Shedding Light on Contaminated Groundwater", Canadian Consulting Engineer, June/July 1998

- Polan, B., and Quigley, S. "Municipal Aquifer Remediation in Elmira, Ontario". Groundwater in a Watershed Context Conference. National Water Research Institute, Burlington, Ontario, December 4-5, 1998
- Van Vliet, D., Richardson, I., and Quigley, S., "E-monitor Technology", Canadian Consulting Engineer, June/July 2004